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**Subject:** ADM File No 2013-02

This is a comment to MCR 3.804 (A) consent and release:

The first paragraph, not numbered, is duplicative of both the adoption code and the section of the Michigan Indian Family Preservation Act (MIFPA) quoted. I do not see that it is necessary to clarify anything with this statement.

(1) This paragraph states that both parents must consent, except in step parent adoption, if the child is an Indian child. Do the drafters intend to rule out the involuntary termination of parental rights under the juvenile code of one parent when the other releases or consents? In relative adoption and in cases in which a child protective proceeding is pending, this is a common occurrence.

(2) Why are the provision of both MIFPA and ICWA repeated here?

(3) And (4) no comment

(C) Withdrawal of consent to Adopt Indian Child

The last line in which it is stated "withdrawal of consent under MCL 712B.13 constitutes a withdrawal of a release executed under MCL 710.29 or a consent to adopt executed under MCL 710.44" if stated at all should be separated so that release and consent are not addressed together. Two very different results when a parent releases from when a parent consents to adoption.